

McCarthy, Holthus & Ackerman, LLP
Cole D. Patton Texas Bar No. 24037247
P.O. Box 866668
Plano, TX 75086
Phone: (214)291-3800
Facsimile: (214) 291-3801
ATTORNEYS FOR MOVANT
-TX-10B-11111-1-ahu

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

IN RE:	§	
DOUGLAS LUGENE JACKSON AND	§	
LAQUENDA JEAN JACKSON	§	
DEBTOR(S)	§	
	§	CASE NO. 10-60001
AMERICAN NATIONAL BANK D/B/A	§	
LEADER FINANCIAL SERVICES, IT'S	§	
SUCCESSORS AND/OR ASSIGNS	§	
MOVANT	§	
VS.	§	
	§	CHAPTER 13
DOUGLAS LUGENE JACKSON AND	§	
LAQUENDA JEAN JACKSON	§	
DEBTORS	§	
AND JOHN TALTON, TRUSTEE	§	
RESPONDENTS	§	

OBJECTION TO CONFIRMATION OF DEBTOR'S CHAPTER 13 PLAN

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

COMES NOW **American National Bank d/b/a Leader Financial Services, it's successors and/or assigns**, a secured creditor and party in interest, hereinafter called ("Claimant"), and files this Objection to Confirmation of Debtor's Chapter 13 Plan and would respectfully show the Court the following:

1. Claimant holds a perfected security interest in all that certain real property described to wit:

LOT 7, NCB 1137-A, HARPER'S RIDGE UNIT 1 AT CUMBERLAND GAP, ACCORDING TO THE AMENDED FINAL PLAT RECORDED IN CABINET D, SLIDE 302-C OF THE PLAT RECORDS OF SMITH COUNTY, TEXAS.

Commonly known as: **8348 STONEBRIDGE WAY, TYLER, TX 75703.**

A copy of said security instrument is attached hereto and incorporated by reference as Exhibit "A".

2. The amount owed Claimant by Douglas Eugene Jackson and LaQuenda Jean Jackson on the loan secured by the Property as of the date of this bankruptcy is \$173,942.72 ("Claim Amount"), with interest and attorney fees continuing to accrue.

3. Upon information and belief, the Plan does not propose to pay the full amount of the claim secured by the property having a pre-petition arrearage of \$21,014.06. Debtor's Chapter 13 Plan lists the scheduled pre-petition arrearage amount of \$18,884.38. The note, which secures the Proof of claim, matures on May 1, 2037. A copy of secured proof of claim is attached hereto and incorporated by referenced as Exhibit "B".

4. For the foregoing reason, Claimant objects to confirmation of the Debtor's Plan.

WHEREFORE, Claimant prays that the confirmation of the Debtor's Chapter 13 Plan be DENIED for the reasons stated hereinabove.

Respectfully Submitted,

MCCARTHY, HOLTHUS & ACKERMAN, LLP

/s/ Cole D. Patton

Cole D. Patton

State Bar No. 24037247

1255 W. 15th Street, Suite 1060

Plano, TX 75075

Phone: (214) 291-3800

Fax: (214) 291-3801

Atty File No.: TX-10B-11111-1

ATTORNEYS FOR SECURED CREDITOR

CERTIFICATE OF SERVICE

I DO HEREBY CERTIFY that a true and correct copy of the foregoing Objection to Confirmation of Debtor's Chapter 13 Plan was served on the parties listed below by the United States Mail, first class postage prepaid or via electronic e-mail by the Clerk of Court on February 8, 2010:

Debtor(s):

Douglas Lugene Jackson
8348 Stonebridge Way
Tyler, TX 75701

LaQuenda Jean Jackson
8348 Stonebridge Way
Tyler, TX 75701

Debtor Attorney:

Gordon Mosley
4411 Old Bullard Road, No. 700
Tyler, TX 75703

Bankruptcy Trustee:

Ronald E. Stadtmueller
110 North College, 12th Floor
Tyler, TX 75702

McCARTHY, HOLTHUS & ACKERMAN, LLP

/s/ Cole D. Patton

Cole D. Patton

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